

**UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

LACAZE LAND DEVELOPMENT, LLC
Plaintiff

v.

CIVIL ACTION NO.:1:19-cv-01477

**DEERE & COMPANY, INC. and
W. L. DOGGETT, LLC d/b/a
DOGGETT MACHINERY SERVICES**
Defendants

**CHIEF JUDGE DEE D. DRELL
MAG. JUDGE PEREZ-MONTES**

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**ANSWER BY DEERE & COMPANY, INC. TO CROSSCLAIM
FOR DAMAGES OF W. L. DOGGETT, LLC d/b/a
DOGGETT MACHINERY SERVICES, LLC**

NOW INTO COURT, comes Deere & Company, Inc. [DEERE] who for answer to the Crossclaim for Damages of W. L. Doggett, LLC d/b/a Doggett Machinery Services, LLC avers as follows:

ANSWER TO CROSSCLAIM

1.

The allegations of Paragraph 42 of the Crossclaim for Damages are denied except to admit DEERE is a Delaware Corporation with its principal business office in Moline, Illinois.

2.

The allegations of Paragraph 43 of the Crossclaim for Damages deal with allegations of plaintiff from the original Petition for Damages for which an answer has already been filed. However, out of an abundance of caution, the allegations are denied as stated.

3.

The allegations of Paragraph 44 of the Crossclaim for Damages are denied as stated.

4.

The allegations of Paragraph 45 of the Crossclaim for Damages deal with allegations of Plaintiff from the Original Petition and call for conclusions of law for which no answer is required. However, out of abundance of caution the allegations pertaining to DEERE are denied.

5.

The allegations of Paragraph 46 of the Crossclaim for Damages are not directed to DEERE and no answer is required. However, out of an abundance of caution, the allegations are denied.

6.

The allegations of Paragraph 47 of the Crossclaim for Damages are denied.

7.

The allegations of Paragraph 48 of the Crossclaim for Damages are denied.

8.

The allegations of Paragraph 49 of the Crossclaim for Damages are denied.

9,

The allegations of Paragraph 50 of the Crossclaim for Damages are denied as stated.

10.

DEERE re-alleges, re-avers and reiterates its Answer and Affirmative Defenses previously filed in the record of this matter as if copied here in extenso.

11. **RESERVATION**

DEERE specifically reserves the right to file additional amended and/or supplemental Answers, Third-Party Complaints, Counterclaims and/or Crossclaims or Answers thereto, additional affirmative defenses and/or other matters constituting avoidance such as the facts of this matter may later disclose and require.

12. **PRAYER**

WHEREFORE PREMISES CONSIDERED, DEERE respectfully requests that: W. L. Doggett, LLC d/b/a Doggett Machinery Services, LLC, Plaintiff in Crossclaim, claims against Deere & Company, Inc. be dismissed with prejudice and at Doggett's cost and for such other and further relief at either law or equity to which DEERE may be justly entitled.

Respectfully submitted,

/s/ PAUL M. LAVELLE
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ATTORNEYS FOR DEERE & COMPANY, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of February, 2020, I electronically filed the foregoing Answer to Crossclaim of W. L. Doggett, LLC d/b/a Doggett Machinery Services, LLC of DEERE to the Clerk of Court for filing and uploading to the CM/ECF system which will send notification of such filing to the following:

LACAZE LAND DEVELOPMENT, LLC

Through its attorney of Record:

FRED A. PHARIS
PHARIS & PHARIS
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Alexandria, LA 71201
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**W. L. DOGGETT, LLC d/b/a
DOGGETT MACHINERY SERVICES, LLC**

Through its attorney of record:

ZELMA M. FREDERICK (31459)
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/s/ PAUL M. LAVELLE (08134)
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